

**STATEMENT OF BASIS (AI No. 42817)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0100072 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Petro Tool & Supply Co., Inc.  
4821 Highway 182  
Houma, Louisiana 70364

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** March 31, 2009

**1. PERMIT STATUS****A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

**B. LPDES permit – LA0100072**

LPDES permit effective date: December 1, 2003

LPDES permit expiration date: November 30, 2008

**C. Date Application Received: February 27, 2009****2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - oilfield service company**

Petro Tool & Supply Co., Inc. is an existing oilfield service company. The facility cleans and maintains company-owned oilfield equipment.

**B. FEE RATE**

1. Fee Rating Facility Type: minor

2. Complexity Type: II

3. Wastewater Type: II

4. SIC code: 1389

**C. LOCATION - 4821 Highway 182, Houma, Lafourche Parish**

Latitude 29° 38' 46", Longitude 90° 41' 08"

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### 3. **OUTFALL INFORMATION**

#### Outfall 001

This outfall was a previous stormwater outfall. This outfall is being removed from the permit based on a review of DMR's that indicated there was only one excursion for this outfall for the last two years. Stormwater will now be addressed in the Stormwater Pollution Prevention Plan (SWP3) language in this permit.

#### Outfall 002

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant  
Location: at the point of discharge from the sewage treatment plant located on the east corner of the facility  
Flow: 500 gpd  
Discharge Route: local drainage thence to Hollywood Canal

#### Outfall 003

Discharge Type: equipment washwater  
Treatment: sump collection pumped through filtration before discharge  
Location: at the point of discharge from the treatment system located on the northeast side of the facility  
Flow: 360 gpd  
Discharge Route: local drainage thence to Hollywood Canal

### 4. **RECEIVING WATERS**

STREAM - local drainage thence to Hollywood Canal

BASIN AND SEGMENT - Terrebonne Basin, Segment 120302

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. drinking water supply\*\*
- f. agriculture

\*\*As per LAC33:IX.1111.A, this use designation shall apply only to listed water bodies and not to their tributaries or distributaries unless so specified. This discharge does not go directly into the Hollywood Canal.

### 5. **TMDL STATUS**

Subsegment 120302 is not listed on LDEQ's Final 2006 303(d) list as impaired. However, subsegment 120302 was previously listed as impaired for nutrients, organic enrichment/low DO, and phosphorus, for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to

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accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL's have been established for subsegment 120302:

The Bayou Folsé Watershed TMDL for Biochemical Oxygen-Demanding Substances and Nutrients was completed on March 31, 2008. Petro Tool & Supply Co., Inc. was not listed in the TMDL. The TMDL states that the existing point sources have little or no impact on the main stem of Bayou Folsé; therefore, no changes to the permitted discharges is required. The COD and BOD<sub>5</sub> limitations will remain in the permit to protect against the further impairment of the waterbody. LDEQ's position, as stated in the declaratory ruling issued by Dale Givens regarding water quality criteria for nutrients (*Sierra Club v. Givens*, 710 So.2d 249 (La. App. 1st Cir. 1997), writ denied, 705 So.2d 1106 (La. 1998)), is that when oxygen demanding substances are controlled and limited in order to ensure that the dissolved oxygen criterion is supported, nutrients are also controlled and limited. LAC 33:IX.2707.C.f.iii allows the establishment of effluent limitations based on an indicator parameter for the pollutant of concern. LDEQ's consistent approach to controlling nutrients where the WQMP does not otherwise require specific nutrient limitations is achieved by limiting the discharge of oxygen-demanding substances through COD and BOD<sub>5</sub> limitations. Compliance with the COD and BOD<sub>5</sub> limitations as the indicator parameters will result in the control of nutrients from the discharge sufficient to attain and maintain the applicable water quality standard. Effluent monitoring of the indicator parameter as conducted by the permittee in accordance with the permit in addition to LDEQ's ambient water quality monitoring program will allow for further evaluation by the Department to determine the effectiveness of the limitation. The reopener clause located in the permit allows the Department to modify or revoke and reissue the permit if the limitations as set on the indicator parameter are shown to no longer attain and maintain applicable water quality standards.

## 6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Changes from previous permit:

- Outfall 001 was removed from the permit.
- The limits for Outfall 002 have been updated in accordance with the reissuance of the Class I Sanitary Discharge General Permit, and the fecal coliform limit has been changed from weekly average to daily max.
- Oil & Grease, visual has been added as a parameter for Outfall 003.

## 7. COMPLIANCE HISTORY/COMMENTS

There have been no recent inspections at the facility. DMR's were reviewed for 1/07-12/08. All DMR's were submitted in accordance with the current permit. Below is a list of the excursions found:

Date	Parameter	Outfall	Reported Value	Permit Limits
12/08	BOD	002	62 mg/L	45 mg/L
6/08	Oil & Grease	003	21 mg/L	15 mg/L
12/07	pH	001	5.84	6-9 s.u.
12/07	Fecal Coliform	002	600 col	400 col/100mL

## 8. EXISTING EFFLUENT LIMITS

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Outfall 001 – stormwater runoff

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow - gpd	Report 1/quarter Est.	Report 1/quarter Est.
COD	---	100 mg/L 1/quarter Grab
TOC	---	50 mg/L 1/quarter Grab
Oil & Grease	---	15 mg/L 1/quarter Grab
pH	6.0 - 9.0 s.u. 1/quarter Grab	

Outfall 002 – treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Weekly Average
Flow - gpd	Report 1/6 months Est.	Report 1/6 months Est.
BOD <sub>5</sub>	---	45 mg/L 1/6 months Grab
TSS	---	45 mg/L 1/6 months Grab
Fecal Coliform	---	400 col./100 mL 1/6 months Grab
pH	6.0 – 9.0 s.u.	

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	1/6 months Grab
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Outfall 003 – equipment washwater

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow - gpd	Report 1/month Est.	Report 1/month Est.
TSS	---	45 mg/L 1/month Grab
COD	200 mg/L 1/month Grab	300 mg/L 1/month Grab
Oil & Grease	---	15 mg/L 1/month Grab
pH	6.0 - 9.0 s.u. 1/month Grab	
Soaps & Detergents	Report 1/month Inv Calculation	---

## 9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120302 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

## 10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the

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Louisiana State Historic Preservation Officer is required.

#### **11. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

#### **12. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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**Rationale for Petro Tool & Supply Co., Inc.**

1. **Outfall 002 - treated sanitary wastewater (estimated flow is 500 gpd)**

Pollutant	Limitation		Reference
	Monthly Avg	Weekly Avg	
	mg/L		
Flow	---	Report	
BOD <sub>5</sub>	30	45	Similar discharges* (BPJ), LAG530000
TSS	30	45	Similar discharges* (BPJ), LAG530000
Fecal Coliform colonies/100ml	200	400 (Daily Max)	Similar discharges* (BPJ), LAG530000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG530000

**Treatment:** sewage treatment plant

**Monitoring Frequency:** Semiannually for all parameters at the point of discharge from the sewage treatment plant located on the east corner of the facility

**Limits Justification:** Limits are based on the previous permit, current guidance for similar discharges from other industrial facilities, and the Class I Sanitary Discharge General Permit, LAG530000 effective November 1, 2007.

2. **Outfall 003 – equipment washwater (estimated flow is 360 gpd)**

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
COD	200	300	Similar discharges*, LAG480000 (BPJ)
TSS	---	45	Similar discharges*, LAG480000 (BPJ)
Oil & Grease	---	15	Similar discharges*, LAG480000 (BPJ)
Soaps & Detergents	Inventory Record	---	Similar discharges*, LAG480000 (BPJ)
Oil & Grease, Visual	---	No Presence	Similar discharges*, LAG480000 (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges*, LAG480000 (BPJ)

**Treatment:** sump collection pumped through filtration before discharge

**Monitoring Frequency:** daily for Oil and Grease, Visual and monthly for flow, TSS, COD, oil and grease, and pH at the point of discharge from the treatment system located on the northeast side of the facility prior to mixing with other waters. Soaps and Detergents: document in a monthly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

**Limits Justification:** Limits are based on the previous permit, current guidance for similar discharges from other facilities, and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

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Note: EPA Guidelines for Metal Products & Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements for exterior equipment washwater are being placed in the permit.

*	Existing permits for similar outfalls
BPJ	Best Professional Judgement
su	Standard Units

#### NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

#### **STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 are considered to have storm water discharges associated with industrial activity.

**For first time permit issuance**, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).